

EXHIBIT AA

From: Sabella, Michael A. [<mailto:msabella@bakerlaw.com>]
Sent: Sunday, June 25, 2017 11:33 AM
To: Kratenstein, Andrew <AKratenstein@mwe.com>
Cc: McDonald, Heather J. <hmcDonald@bakerlaw.com>; Tranbaugh, Molly <mtranbaugh@bakerlaw.com>; McGourty, Cara <cmcgourty@bakerlaw.com>; Keranen, Kristin L. <kkeranen@bakerlaw.com>; Huttenlocher, Michael <MHuttenlocher@mwe.com>; Azman, Darren <Dazman@mwe.com>; Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: RE: Microfilm Productions

Andrew,

As an initial matter, the Trustee has never represented that there were only 201 microfilm reels in the BLMIS records. The Trustee is in possession of nearly 5,300 reels of microfilm. We had previously restored nearly 400 reels of microfilm, based on their labels and dates, including reels from the pre-1992 time period. The 201 reels of microfilm recently restored and produced to you in their entirety were a separate production focused on identifying additional pre-1992 reels, bringing the total number of reels of microfilm restored to approximately 600. We have produced to you (1) the entire restored 201 reels of microfilm, and (2) documents from the restored 400 reels of microfilm that were responsive to the list of 147 search terms, as explained in my email of April 6, 2017. With the restoration of the recent 201 reels, all pre-1992 microfilm reels have been restored.

I hope this explanation clears up any confusion.

Regards,

Michael

Michael Sabella

Associate

BakerHostetler

45 Rockefeller Plaza
New York, NY 10111-0100
T +1.212.589.4625

msabella@bakerlaw.com

bakerlaw.com



From: Kratenstein, Andrew [<mailto:AKratenstein@mwe.com>]
Sent: Monday, June 19, 2017 1:47 PM
To: Sabella, Michael A.
Cc: McDonald, Heather J.; Tranbaugh, Molly; McGourty, Cara; Huttenlocher, Michael; Azman, Darren; Helen Davis Chaitman (hchaitman@chaitmanllp.com)
Subject: Microfilm Productions

Michael,

We have been reviewing the Trustee's microfilm production and are concerned that there may be substantial gaps in it. Specifically, Mr. Jacobs' March 8, 2017 letter to Judge Bernstein (attached) identifies "201 reels of microfilm" that the Trustee's counsel was then in the process of restoring and producing. We understood based on Mr. Shifrin's letters dated March 6, 2017 and April 26, 2017 (also attached) that the Trustee's microfilm production was completed on April 26, 2017.

We recently located in the microfilm production the attached certification from Tri Microfilm referencing a processed reel number 321. Accordingly, we have the following requests/questions:

1. Please explain why your firm has represented that there were only 201 reels of microfilm when it appears that there were at least 321 microfilm reels.
2. Please confirm whether there is any microfilm that the Trustee's counsel has not restored and produced.
3. Please confirm whether the microfilm production was limited in any way. For example, were all microfilmed Madoff or BLMIS bank records produced?

Thank you.

Andrew

Andrew B. Kratenstein
Partner

McDermott Will & Emery LLP | 340 Madison Avenue | New York, NY 10173-1922
Tel +1 212 547 5695 | Mobile +1 646 338 4881 | Fax +1 212 547 5444

[Biography](#) | [Website](#) | [vCard](#) | [Email](#) | [Twitter](#) | [LinkedIn](#) | [Blog](#)

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